
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. Leda D. Wettre
:
v. : Mag. No. 25-13038
:
MARTIN KURZER : **CRIMINAL COMPLAINT**

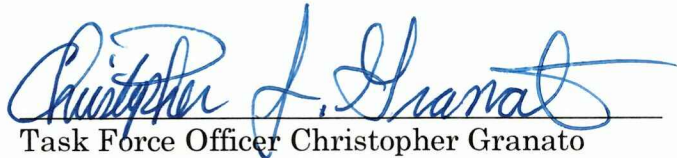
I, Christopher Granato, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Task Force Officer with the Federal Bureau of Investigation, and that this complaint is based on the following facts:

SEE ATTACHMENT B

Continued on the attached pages and made a part hereof.



Task Force Officer Christopher Granato
Federal Bureau of Investigation

Task Force Officer Granato attested to this Complaint by telephone pursuant to Fed. R. Crim. P. 4.1(b)(2)(A), on January 31, 2025.



Honorable Leda D. Wettre
United States Magistrate Judge

ATTACHMENT A

(STALKING)

From in or around 2020 through the present, in Essex County, in the District of New Jersey and elsewhere, the defendant,

MARTIN KURZER,

with the intent to harass and intimidate, and place under surveillance with the intent to harass and intimidate another person, did use the mail, any interactive computer service, electronic communication service, electronic communication system of interstate commerce, and any other facility of interstate and foreign commerce to engage in a course of conduct that – (A) placed that person in reasonable fear of death and serious bodily injury to a person; and (B) caused, attempted to cause, and would reasonably have been expected to cause substantial emotional distress to that person, an immediate family member of that person, or a spouse or intimate partner of that person.

In violation of Title 18, United States Code, Section 2261A(2).

ATTACHMENT B

I, Christopher Granato, am a Task Force Officer with the Federal Bureau of Investigation ("FBI"). I am fully familiar with the facts set forth herein based on my own investigation, my conversations with witnesses and other law enforcement officers, and my review of reports, documents, and items of evidence. Where statements of others are related herein, they are related in substance and in part. Because this complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. The FBI is presently investigating Martin Kurzer ("Kurzer") for an ongoing stalking and harassment campaign that he has waged against a victim ("Victim-1") and her family since 2009 and through the present.

2. In or around 2009, Victim-1 encountered Kurzer at New York Penn Station. Victim-1 and Kurzer went to high school in New Jersey together, but they were not friends or romantic partners. During this chance encounter, Kurzer approached Victim-1, who declined to shake Kurzer's hand.

3. Since the 2009 Penn Station encounter and continuing through the date of this Complaint, Kurzer has repeatedly stalked, harassed, and threatened Victim-1 and her family, often contacting them via phony Facebook accounts after they blocked his own personal accounts. Several earlier messages sent by Kurzer to Victim-1 referenced the 2009 Penn Station encounter. For example:

- a. On or about August 17, 2009, Kurzer sent Victim-1 a message via Facebook stating, "why didn't u want to shake my hand @ penn station? TACKY AND RUDE".
- b. On or about September 24, 2010, Kurzer sent Victim-1 a message via Facebook stating, "IF I EVER SEE U AGAIN I WILL WRECK UR FACE UR GONNA BE SORRY."
- c. On or about March 17, 2011, Kurzer, using a "burner" Facebook account¹ sent Victim-1 a message stating, "ooohh u r such a bitch! Y didn't u wanna shake hands? B I T C H".

4. Throughout Kurzer's harassment campaign, Victim-1 has repeatedly

¹ A "burner" account in this context was a Facebook account created by Kurzer using a phony name or alias to avoid detection by Victim-1, and later, Victim-1's family. Kurzer was able to use such accounts to continue contacting Victim-1 and her family after they blocked or reported other accounts known to be associated with him.

contacted law enforcement, which has resulted in several orders of protection being entered against Kurzer, which Kurzer has frequently violated. For example, in or around 2011, Victim-1 obtained an order of protection in New York City (the "2011 Restraining Order") after receiving numerous threatening and harassing communications from Kurzer. Kurzer violated restraining orders several times, including on or about May 27, 2011 and on or about August 4, 2013. The August 4, 2013 incident involved Kurzer threatening Victim-1 over Facebook.

5. On or about December 14, 2013, Kurzer was arrested in New York City for an incident unrelated to Victim-1. Also on December 14, 2013, Kurzer was arrested and charged with criminal contempt for the August 4, 2013 incident. Kurzer pled guilty to Criminal Contempt and a charge unrelated to Victim-1. As a result of the December 14, 2013 arrest, Kurzer spent time incarcerated at Rikers Island. Kurzer's anger and vicious conduct directed at Victim-1 and her family escalated following this incarceration period, with Kurzer frequently expressing anger that he was sent to Rikers Island.

6. On or about May 19, 2014, Victim-1 again obtained an order of protection against Kurzer, which expired after five years, on or about May 18, 2019. According to Victim-1, during the time period between May 2014 and May 2019, when the protection order expired, Kurzer did not contact Victim-1.

7. In or around June 2020, Kurzer resumed his harassment and stalking of Victim-1. Specifically, Kurzer frequently: (a) contacted Victim-1 via Facebook and engaged in harassing communications; (b) called Victim-1 from different phone numbers; and (c) contacted Victim-1's family members using the same methods. During one incident, Kurzer called Victim-1 approximately 30 to 40 times in a row from different phone numbers, believed to be generated by a computer. Kurzer's harassing conduct escalated to a point where Victim-1 and her husband felt compelled to hire an armed security guard to be present for their wedding.

8. Kurzer's harassing conduct has continued for years following its resumption in 2020. At times, Kurzer acknowledged that he was aware of the prior restraining orders and boasted about being able to harass Victim-1 again after the 2014 order's expiration. For example, on or about September 5, 2022, Kurzer left a voicemail on Victim-1's cell phone in which he stated, "Listen, your restraining order expired so what's with the silent treatment? If you're tape recording me it doesn't matter, there's nothing you can do. Your fucking restraining order expired. You fucking stupid loser. Fucking loser. Fucking loser. Fuck off. Fuck you and fuck off."

9. After Victim-1 deleted her Facebook account due to Kurzer's harassing communications, Kurzer began directing his harassment at Victim-1's family. For example, on or about June 3, 2023, Victim-1's stepfather received the following Facebook message from Kurzer, using a burner Facebook account:

WHO THE FUCK DO U THINK U ARE. YOUR DAUGHTER [Victim-1 first name] IS A DIRTY JEW RAT FACE WITH A FUCKING BUSTED UGLY HUSBAND. [Victim-1 first name] and [Victim-1 sister's first name] ARE FUCKIG UGLY DIRTY JEWS. ... U fuck with me; U DIE ... BOTH YOUR DAUGHTERS ARE DIRTY FAT JEW PIGS ... SHES [Apparently referring to Victim-1's sister] AN UGLY DIRTY JEW. MARRIED TO A DIRTY FILTHY INDIAN N****R RED CURRY. ... I WAS FUCKING SENT TO RIKERS TWICE BECAUSE OF YOUR FUCKING JEW BASTARD ... TRY TO COMPLAIN ABOUT ME AND I WILL DESTROY YOU ... YOU WILL BE SORRY I PROMISE. U DESERVE TO BE HUNG OR SHOT.

10. In or around July 2023, Victim-1's sister received the following Facebook message from Kurzer, using a burner account:

YOUR SISTER GOT ME INTO BIG TROUBLE BECAUSE SHE IS A BITCH ... U ARE A. UGLY JEW BITCH WHO MARRIED A FUCKING DIRTY INDIAN N****R. BITCH I WILL FUCKING MURDER YOU. I SWEAR TO GOD. I WILL BASH YOUR FUCKING HEAD WITH A BASEBALL BAT U ASSHOLE.

11. The next day Kurzer, using a burner Facebook account, sent the following message to Victim-1's sister:

I WAS JUST JOKING BUT 'WORD OF ADVICE' IF U TRY TO REPORT ME TO THE POLICE THEN I WILL REALLY BEAT YOU UP ... YOUR FUCKING SISTER HAD ME SENT TO RIKERS. I FUCKING CONTRACTED TUBERCULOSIS (sic) OF YOUR FUCKING WHORE SISTER. I SWEAR TO GOD. IF I SEE U. UR FUCKING SISTER SENT ME TO RIKERS THAT FUCKING WHORE. UR FU[C]KING STUPID JEW FAM. I SWEAR TO GOD. I WILL MURDER YOU. ONLY IF U REPORT ME. IF U REPORT ME U ARE FUCKING DEAD MEAT. U will be safe ONLY if u disregard these messages. IF U TRY TO REPORT ME U ARE DEAD; THATS not a threat – it is a promise.

12. Also in or around July 2023, Kurzer, again using a burner Facebook account, sent additional threatening communications to Victim-1's sister in which he threatened both Victim-1's sister and Victim-1's infant child. For example, in a string

of messages, Kurzer stated:

[Victim-1]'S BABY WILL GET SKAUGHTERED (sic)
Bitch
I WILL MAKE SURE
[Victim-1 first name]'S BABY
IS BURNED ALIVE
AND U WILL BE HUNG OR SHOT
I PROMISE.

13. Again, approximately one or two days after sending the above messages, Kurzer sent another message stating, "Just kidding this was a joke...."

14. On or about October 24, 2023, Kurzer called Victim-1's father-in-law's cell phone and home phone in New Jersey at approximately 2:00 a.m., attempting to find Victim-1's husband.

15. On or about February 6, 2024, Kurzer, using a burner Facebook account, sent a Facebook message to Victim-1's husband that stated in part:

FUCKING LISTEN
FUCKING LISTEN
U MARRIED A CREEP BITCH
IF I HEAR FROM UR WIFE
IF SHE DOES ANYTHING AGAIN
I AM FILING A CRIMINAL COMPLAINT
THAT UR WIFE IS A RELENTLESS BITCH. . .

16. On or about February 9, 2024, Kurzer, using a burner Facebook account, sent a Facebook message to Victim-1's husband that stated in part:

Do me a HUGE FAVOR -ur WIFE [Victim-1 first name]
SUBJECTED ME TO EXTREME TORTURE, my balls
were sprayed with pepper spray and I contracted TB (I'm
cured now) BUT JUST LET HER KNOW SHE WILL BE
ARRESTED. SHE TAKES ANY TYPE OF ACTION
AGAINST ME I WILL FILE CRIMINAL AND CIVIL
SUITS AGAINST HER BECAUSE SHE IS REALLY
RELENTLESS. . .

17. On or about May 16, 2024, Kurzer, using a burner Facebook account, sent a message to Victim-1's stepmother stating, "I AM SO FUCKING HAPPY [Victim-1's stepfather] DIED U FAT HORSE PIG." On or about October 20, 2014, Kurzer sent a Facebook message to Victim-1's stepmother stating, "U DON'T EVER FUCKING PUT MY LIFE IN DANGER. OR I WILL HAVE [VICTIM-1] SHOT."